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**From:** Burger, Riley [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BURGER, RILEY]  
**Sent:** 6/7/2021 3:07:48 PM  
**To:** Opila, MaryCate (Opila.MaryCate@epa.gov) [Opila.MaryCate@epa.gov]  
**Subject:** RE: INVENERGY NSR Comments  
**Attachments:** EPA Comments Invenergy.docx

Hi Mary Cate,

A revised version of the comments document, Ex. 5 Deliberative Process (DP) is attached. Let me know if you have any final edits and I can make those changes. If you are good with this version, please convert to PDF and sign. I will then transmit to ACHD along with Tim's modeling comments. Comments are due by EOD Tuesday.

From the VA permit examples you forwarded and the other VA examples I'd come across in my research it does look like that lb/event limits for SSM are often included. But in these materials I wasn't able to find the underlying requirement. So for both this issue and SSM broadly I'd like to continue the conversation. They seem likely to be issues/topics that will pop up again.

**Riley Burger**

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**From:** Burger, Riley  
**Sent:** Thursday, June 03, 2021 3:17 PM  
**To:** Opila, MaryCate (Opila.MaryCate@epa.gov) <Opila.MaryCate@epa.gov>  
**Subject:** RE: INVENERGY NSR Comments

Hi Mary Cate,

I've taken a stab at addressing the additional areas for comment we discussed yesterday. As a reminder the comment period closes next Tuesday, June 8.

Comments attached and original here:

H:\2000 Permits\ACHD\Invenergy (Allegheny Energy Center)\PSD-NSR 2021

Additional info below:

- I've looked through our guidance databases and am struggling to find a citation or clear guidance requiring limits at all times including SU/SD. The 2015 SSM policy we discussed is specific to SIP actions and the FRN doesn't speak directly to NANSR or PSD. Looking at Virginia permits, the C4GT PSD permit does define the time period of various SU/SD activities and includes lb/event limits but others, such as Dominion Brunswick, only define the time periods (though perhaps it should have included more). Wondering if Mike Gordon might have some knowledge on where to look if he can be reached before Tuesday?
- Testing: neither our federal PSD regs nor PA's NA NSR regs appear to list permit content such as testing. The regs for initial and ongoing testing cited in Invenergy permit is general ACHD permit regs so I left those comments as is.

- Although the narrative in the application only highlights the comparison to SIPed emissions limits (which is a valid minimum per federal NA NSR regs) the application also does include extensive RBLC search and comparison. I did add a comment directing ACHD to make clear what their determination is vs. the facilities technology choices.

**Riley Burger**

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**From:** Burger, Riley

**Sent:** Wednesday, May 26, 2021 3:42 PM

**To:** Opila, MaryCate ([Opila.MaryCate@epa.gov](mailto:Opila.MaryCate@epa.gov)) <[Opila.MaryCate@epa.gov](mailto:Opila.MaryCate@epa.gov)>

**Subject:** INVENERGY NSR Comments

Hi MC,

I'm drafting comments on ACHD's INVENERGY major NSR and wanted to get a time on your calendar to discuss. Can you extend the Wednesday 6/2 check-in to an hour or propose another time in advance of 6/8 (end of comment period)? There will be modeling comments from Tim to include as well.

**Riley Burger**

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